

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

UNITED STATES OF AMERICA)	CASE NO.: 5:19-CR-674
)	
Plaintiff,)	JUDGE: JOHN R. ADAMS
)	
v.)	MOTION TO REINSTATE
)	<u>BOND</u>
AUSTINE H. HEINEY)	
)	
Defendant.)	

Now comes the Defendant, Austine H. Heiney, by and through counsel, and respectfully requests that the Court consider reinstating his bond in the above-captioned matter.

He is housed at the Corrections Corporation of America's facility in Hubbard, Ohio. He was quarantined for a period of time and is now out in open population.

He requests that the Court consider reinstating his house arrest. This is due to the less serious nature of the crime he plead to. Further, the circumstances with the corona virus puts anyone in a facility like he is in at risk. Additionally, he is concerned that the sentencing that is currently scheduled is likely to be continued because of the Governor's lockdown orders.

Wherefore, he respectfully requests that the Court return him to house arrest.

Respectfully submitted,

\s\ GEORGE G. KEITH
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PROOF OF SERVICE

A copy of the foregoing Motion to Reinstate Bond was sent this 7th day of May 2020, by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Also, a copy was sent via fax transmission to Jason M. Katz, Assistant U.S. Attorney, 330-746-0239.

\s\ GEORGE G. KEITH
GEORGE G. KEITH #0012606
Attorney for Defendant